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October 20, 2021

VIA CM/ECF AND E-MAIL

Hon. Victor Marrero, U.S.D.J.
U.S. District Court for the Southern District of New York
500 Pearl Street, Suite 1610
New York, New York 10007
ChambersNYSDMarrero@nysd.uscourts.gov

Re: *Bruce J. Reid v. Jonathan S. Sack, et al.*
Civil Action No. 20-cv-01817 (VM)
Proposed Revised Case Management Plan and Order – On Consent

Dear Judge Marrero:

This firm represents Plaintiff Bruce J. Reid ("Plaintiff") in the above-referenced action. With the consent of counsel for Defendants Jonathan S. Sack ("Sack"), Michael H. Mui ("Mui"), and Sack & Sack, LLP (collectively, "Defendants") (copied), Plaintiff respectfully submits the proposed revised Civil Case Management Plan and Scheduling Order ("CMP") attached.

The CMP was previously modified on or about August 3, 2021 in light of Plaintiff's settlement of an underlying arbitration against his former employer(s). *See* CM/ECF Docs. 37-38. Since that time, counsel for the parties have met and conferred regarding the completion of document discovery with both Plaintiff and Defendants recently making supplemental productions. Counsel for the parties also recently agreed to the following schedule for depositions: (1) Plaintiff – November 17, 2021; (2) Mui – November 18, 2021; (3) non-party Jane Albertson (Mui's assistant) – December 2, 2021; and (4) Sack – December 16, 2021. We respectfully request that the proposed revised CMP be entered accordingly.

Respectfully submitted,



Chester R. Ostrowski, Esq.

cc: All Counsel of Record (via CM/ECF)
Jamie R. Wozman, Esq. (via e-mail)
Lee S. Shalov, Esq. (via e-mail)